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Attorneys for Plaintiff PNHC, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PNHC, LLC,

Plaintiff,

v.

GANJA, LLC, d/b/a HYDRO Las Vegas, a
Nevada limited liability company; MITCHELL
HOSTMEYER, an individual; JAMES
GREENWOOD, an individual; MARCIA
HAGER, an individual; SOCIAL WEALTH,
LLC, a Nevada limited liability company dba
CILI BY DESIGN; DOES INDIVIDUALS 1-
10; ROE CORPORATIONS 1-10,

Defendants.

CASE NO.: 2:21-cv-00906-JCM-EJY

**JOINT MOTION TO STAY
PROCEEDINGS PENDING
RESOLUTION OF RELATED
LITIGATION**

PNHC, LLC, (“Plaintiff”) and Ganja, LLC d/b/a HYDRO Las Vegas, Mitchell
Hostmeyer, and James Greenwood (“Ganja Defendants”), by and through undersigned
counsel, hereby jointly move the Court for an order to stay proceedings in the underlying

1 action while subject-matter related but separate litigation is resolved in Nevada state court.

2 Plaintiff and Ganja Defendants respectfully show the Court:

3 1. Plaintiff's Complaint in this case was filed May 7, 2021.

4 2. Ganja Defendants timely filed their answer to the Complaint on December
5 8, 2021.

6 3. On or around March 21, 2022, Ganja Defendants provided answers and
7 responses to Plaintiff's *First Set of Interrogatories and Requests for Production of*
8 *Documents*. Ganja Defendants also submitted their *First Supplement to Early Case*
9 *Conference List of Witnesses and Documents*. In these submissions Plaintiff discovered that
10 Ganja Defendants accepted Plaintiff's wire transfer deposit of \$362,500.00 on March 25,
11 2020, and on the same day wired \$350,000.00 to SBL, LLC, d/b/a Global Cannabinoids
12 (hereinafter "Global"), a Nevada company and third-party manufacturer, who had entered
13 into a separate agreement with Ganja Defendants to manufacture the 4,000,000 bottles of
14 hand sanitizer Plaintiff had ordered from Defendant Ganja.
15

16 4. Global accepted the \$350,000.00 from Ganja Defendants but did not
17 manufacture or deliver any bottles of hand sanitizer.
18

19 5. Defendant Ganja has claims against Global for breach of contract and other
20 causes of action, related to their separate contract and to the transfer of funds.
21

22 6. On February 10, 2022, Defendant Ganja filed its *Amended Complaint* in
23 Nevada state court against Global and other potentially related companies, seeking damages
24 for breach of contract and other causes of action (hereinafter "Related Litigation"). Please
25 see *GANJA, LLC DBA HYDRO LAS VEGAS, a Nevada Limited Liability Company v. SBL,*
26 *LLC dba GLOBAL CANNABINOIDS, a Nevada Limited Liability Company; GLOBAL*
27

1 *SANITIZER TECHNOLOGIES, LLC, a Nevada Limited Liability Company; DOES 1-10,*
2 *inclusive; and ROE CORPORATIONS 1-10, inclusive;* Case No.: A-22-847810-C, Eighth
3 Judicial District Court, Clark County, Nevada, attached to this Motion as Exhibit A.

4 7. Included in these claims is a demand for the return of \$350,000.00, the
5 amount Defendant Ganja wired to Global following Defendant Ganja's receipt of
6 \$362,500.00 from Plaintiff in the present action. Defendant Ganja references Plaintiff
7 throughout this separate Nevada state court action.
8

9 8. Plaintiff and Ganja Defendants now agree that if Global properly responds
10 to the Related Litigation and returns the \$350,000.00 it received from Defendant Ganja, that
11 Defendant Ganja will be in a position to return Plaintiff's wire transfer deposit and that the
12 instant case may not need to be further litigated.

13 9. Because of this Related Litigation, Plaintiff and Ganja Defendants believe it
14 would be beneficial and most efficient to all active parties in the present litigation for this
15 Court to grant a stay of proceedings in the instant action while the Related Litigation
16 between Defendant Ganja and Global is litigated and resolved in Nevada state court.
17

18 10. Once the Related Litigation between Defendant Ganja and Global is either
19 successfully resolved or terminated, Plaintiff agrees to dismiss the instant action or request
20 that this Court lift the stay of proceedings in the instant action and resume litigation of the
21 instant case.
22

23 11. For these reasons, Plaintiff and Ganja Defendants respectfully request that
24 this Court grant a stay of proceedings in this action.
25
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12. This motion is not interposed for the purposes of delay, but instead is jointly requested in good faith to give the parties the time and resources to pursue resolution of the related claims in the Related Litigation.

WHEREFORE, Plaintiff and Ganja Defendants respectfully and jointly request that this Court grant their joint motion to stay proceedings during the pendency of the Related Litigation, as more fully discussed herein.

This the 7th day of July, 2022.

ALDRICH LAW FIRM, LTD.

/s/ John P. Aldrich

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CERTIFICATE OF SERVICE

This is to certify that on this date the foregoing **JOINT MOTION TO STAY PROCEEDINGS PENDING RESOLUTION OF RELATED LITIGATION** was electronically filed with the Clerk of Court using the CM/ECF System, which will send notification to all attorneys of record in this matter.

This the 7th day of July, 2022.

FABIAN VAN COTT

By: /s/ Trevor R. Waite
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Nevada limited liability company;
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MARCIA HAGER, an individual; SOCIAL
WEALTH, LLC, a Nevada limited liability
company dba CILI BY DESIGN; DOES
INDIVIDUALS 1-10; ROE
CORPORATIONS 1-10,

Defendants.

CASE NO.: 2:21-cv-00906-JCM-EJY

**ORDER
GRANTING JOINT MOTION
TO STAY PROCEEDINGS
PENDING RESOLUTION OF
RELATED LITIGATION**

The Joint Motion to Stay Proceedings Pending Resolution of Related Litigation
("Motion") having come before this Court, and for good cause appearing therefore, this

1 Court ORDERS as follows:

- 2 1. The Motion is GRANTED, in its entirety;
- 3 2. Case 2:21-cv-00906-JCM-EJY shall be stayed during the pendency of *GANJA, LLC*
- 4 *DBA HYDRO LAS VEGAS v. SBL, LLC dba GLOBAL CANNABINOIDS, et. al.*, in
- 5 the Eighth Judicial District Court, Clark County, Nevada, under case number A-22-
- 6 847810-C.

7 **IT IS SO ORDERED.**

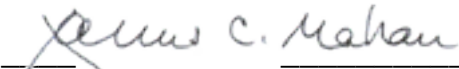
8 Dated: July 11, 2022

9 _____

10 IT IS FURTHER ORDERED that

11 the parties shall notify this Court

12 upon resolution of the State case.

13 

14 _____

15 Hon. James C. Mahan

16 Judge, United States District Court

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